

I would like to add the following comments, generally in support of LPFM:

* Today's commercial high power broadcasters ought to be enforced to strictly observe modulation limits. I have visited several commercial stations and seen their needles routinely pegging at say 120% modulation. We should also recognize these practices for what they are: PIRACY! Do your job and enforce these. A high-power station bleeding out-of-band does much greater damage than a low-power could ever do.

* Put the high-powers on a closer spacing, two or three stop bands of protection is crazy. Go to one stop band. Reallocate to get 50 high-powers in a major market to increase competition. Low-quality receivers is a self-perpetuating situation. Put the high-powers on a tighter spacing to force better receivers, and/or enforce minimum quality standards on receivers as well.

* "Efficient" use of bandwidth IS low-power, low radius. That is what cell phones are all about, for example. Head in the direction, in general, of restricting power, restricting bandwidth, in order to have community-oriented radio markets. The high-power stations blast all the surrounding communities with advertising, news, and media which is inappropriate for the markets that they are splattering across, or worse, they blandify their music, message, news, and advertising such that they are not targeting any particular market.

* Having said the above, my experience is that 10-watt and under stations are a little too weak to form an effective "community". See below.

* Twenty-five years ago, when I was in high-school, the school had a legal, licensed low power radio station. This was a wonderful educational opportunity for many kids who didn't otherwise "fit in" at the school. I know one kid went on to date to have a twenty-five year career in radio. Another became an electrical engineer. These were great kids, clean-thinking, whose only "crime" was to want to expose the local community to more, different, choices in musical listening. And *who* "stole" this bandwidth -- where did this bandwidth go? -- The FCC stole it from the kids, in order to protect big commercial radio from the threat of musical diversity! The only complaints this station got from the community was why don't you broadcast at more than ten watts??? We love you but we can't always hear you!!!

* Educational, non-commercial, low-power, free or low-cost licensing should be given priority. Second priority ought to be community not-for-profit. If you allow for-profits in this area, you need to keep the big-watt for-profits from also palying in the small-watt category. Else the big-watts can use their big-watt profits to also monopolize the small-watts, keeping user choice of music or message from happening here also.

* "Freedom of Speech" and Expression: You can only have this if minority voices can speak out, if minority music can be heard, as well as *mainstream* messages and music. When you auction to the highest bidder you can only get 100 majority voices all saying the same thing, you never end up with any minority voices. It IS in the community interest for alternative voices to be heard, else you end up with the kinds of

frustrations and "piracy" problems now being faced -- you might as well be talking about requiring government permission to post a poster in Tienamann Square! People -- any and all people -- need to have an opportunity to set up their soap box and be heard. No this does not need to lead to anarchy or destruction of the air waves. Low-wattage and low-radius limits each so that all have a chance to speak their peace. Traditionally Americans do not need government permission to speak, associate, nor form communities. The FCC needs to reflect honestly on how their licensing rules and regulations and auctions have effectively worked against the constitutional values Americans pretend to hold dear, and the FCC needs to work better to mitigate the damages their myopic rule-making and auctioning has cause.

* Re above, in addition to the low-power licensed stations being considered, suggest you also allow a limited number of stop-band slots at the top and bottom of the dial for an unlicensed, or nearly unlicensed, lunatic fringe "playpen". The only requirement being that such stations

be low-power, stay on one of these allowed frequency slots, not bleed, and not deliberately "poach" frequency and location of some other "fringe" station while other "playpen" slots are available.

Thank you for your sincere consideration,

James L. Adcock